

File No.: 09-18-388

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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

ELIZA ZONN,

Plaintiff,

vs.

**ARMANDO MACIASVALDEZ, DE LA H
TRUCKING, POINT DIRECT
TRANSPORT, INC., JOHN DOES 1-
10, (said names being
fictitious),**

Defendant(s) .

**Civil Action No.:
2:19-cv-12087**

PETITION FOR REMOVAL

Removing Defendants, ARMANDO MACIAS VALDEZ i/p/a ARMANDO MACIASVALDEZ and POINT DIRECT TRANSPORT, INC., upon information and belief state as follows:

1. On or about April 15, 2019, Plaintiff, Eliza Zonn, commenced an action against the removing Defendant, Armando Macias Valdez i/p/a Armando Maciasvaldez, in the Superior Court of New Jersey, County of Essex, bearing docket number ESX-L-2822-19. A copy of the Complaint is annexed hereto as **Exhibit A**.

2. Plaintiff is a resident of the State of New Jersey. (See Exhibit A, Complaint).

3. Defendant, Armando Macias Valdez, is a resident of the State of California.

4. Defendant, Point Direct Transport, Inc. is a corporation organized and existing under the laws of the State of California with a principle place of business in California.

5. Defendant De La H Trucking has not appeared in this action.

6. Defendants were served less than 30 days ago, on or about April 15, 2019.

7. Upon information and belief, the amount in controversy is more than \$75,000.00

8. Accordingly, this Court has diversity jurisdiction of this action pursuant to 28 U.S.C. § 1332, and Defendants are entitled to removal of this action pursuant to 28 U.S.C. § 1441.

WHEREFORE, Defendants pray that this action be removed to the United States District Court for the District of New Jersey, pursuant to 28 U.S.C. § 1441 and § 1446.

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By:



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Dated: May 3, 2019